

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- REVISED

PERMITTEE

Romar Cabinet and Top Company, Inc.
Attn: Anthony De Angelis
23949 South Northern Illinois Drive
Channahon, Illinois 60410

<u>Application No.:</u> 97080098	<u>I.D. No.:</u> 197420AAC
<u>Applicant's Designation:</u> CABINET 1	<u>Date Received:</u> December 27, 2004
<u>Subject:</u> Cabinet and Top Making Equipment	
<u>Date Issued:</u> April 25, 2005	<u>Expiration Date:</u> February 4, 2008
<u>Location:</u> 23949 South Northern Illinois Drive, Channahon	

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of five spray booths with filters, two natural gas-fired air makeup units and a contact adhesive station pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., volatile organic material (VOM) to less than 25 tons per year, individual hazardous air pollutants (HAPs) to less than 10 tons per year, and a combination of HAPs to less than 25 tons per year). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
2. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
- 3a. Total emissions of volatile organic material from the above-referenced plant, including both coating lines and all other emission units, shall not exceed 25 tons per year. This condition is required to meet the exemption limit specified in 35 Ill. Adm. Code 218.208(b).

- b. Pursuant to 35 Ill. Adm. Code 218.211(b) (4), for sources exempt under 35 Ill. Adm. Code 218.208(b), the owner or operator of a coating line or group of coating lines shall collect and record all of the following information for each coating line and maintain the information at the source for a period of three years:
 - i. The name and identification number of each coating as applied on each coating line; and
 - ii. The weight of VOM per volume and the volume of each coating (minus water and any compound which are specifically exempted from the definition of VOM) as applied on each coating line on a monthly basis.
- c. Emissions and operation of the five spray booths, including all clean-up operations shall not exceed the following limits:

VOM Emissions	
<u>(Lb/Month)</u>	<u>(Tons/Year)</u>
6,000	23.5

This limit is determined by the maximum VOM content of each material multiplied by the amount of each material used per year minus the minimum amount of VOM shipped off-site for disposal each year.

- d. Usage and emissions of volatile organic material from each spray booth or contact adhesive station shall not exceed 8 lbs/hour, pursuant to 35 Ill. Adm. Code 218.301.
 - e. This permit is issued based on no VOM being used to clean the paint spray guns.
 - f. Compliance with the annual limits shall be determined from a running total of the previous 12 months of data.
4. Emissions and operation of the two natural gas-fired air makeup units and all other natural gas-fired equipment shall not exceed the following limits:

Maximum Facility Firing Rate <u>(mmBtu/Hour)</u>	Pollutant	Emission Factor <u>(Lb/mmBtu)</u>	Emissions	
			<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
6.2	NO _x	0.098	1.00	2.7
	CO	0.083	0.84	2.3
	VOM	0.0075	0.08	0.2

These limits are based on standard AP-42 emission factors. Compliance with annual limits shall be determined from a running total of 12 months of data.

- 5a. The Permittee shall maintain records of the following items, and such other items as may be appropriate to allow the Illinois EPA to review compliance with the limits in this permit.
- i. Usage of each type of coating, thinner, and any other VOM containing material (tons/month and tons/year);
 - ii. VOM and HAP content of each type of coating, thinner, and any other VOM containing material (weight %);
 - iii. Amount of VOM and HAP shipped off-site for disposal (tons/month and tons/year);
 - iv. Operating hours for each of the five paint booths (hours/month and hours/year); and
 - v. Detailed calculations of VOM and HAP emissions (tons/month and tons/year).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
6. Pursuant to 35 Ill. Adm. Code 218.211(b)(6), any owner or operator of a source exempt from the limitations of 35 Ill. Adm. Code 218.204(1) because of 35 Ill. Adm. Code 218.208(b) shall notify the Illinois EPA if the source's VOM emissions exceed the limitations of 35 Ill. Adm. Code 218.208(b) by sending a copy of calculations showing such an exceedance within 30 days after the change occurs.
7. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
8. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

It should be noted that this permit has been revised to change the usage and emissions limits for the spray booths as requested by the company.

It should also be noted that all cleanup operations and the adhesive station have been added to this permit.

It should also be noted that two spray booths have been added from Construction Permit 03050080.

Please note the 2 small paint booths from Construction Permit 03050080 and a second gas-fired air make-up unit have been added to this permit.

If you have any questions on this, please call Randy Solomon at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:RBS:psj

cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the coating plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are well below the levels, e.g., 25 tons per year of volatile organic material (VOM), 10 tons per year of individual hazardous air pollutants (HAPs), and 25 tons per year of a combination of HAPs at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, less coating is applied and a lower VOM content coating is used and control measures are more effective than required in this permit.

<u>Equipment</u>	VOM <u>(Tons/Yr)</u>	NO _x <u>(Tons/Yr)</u>	CO <u>(Tons/Yr)</u>	HAPs	
				Single <u>(Tons/Yr)</u>	Combined <u>(Tons/Yr)</u>
5 Spray Booths	23.5				
Adhesive Station	1.2				
Natural Gas	<u>0.2</u>	<u>2.7</u>	<u>2.3</u>		
Totals	24.7	2.7	2.3	< 10	< 25

RBS:psj